

1 Erika Jacobsen White – SBN 251323  
Brian J. Markovitz (pro hac vice)  
2 Valerie A. Grove (pro hac vice)  
3 Joseph Greenwald & Laake, P.A.  
6404 Ivy Lane, Suite 400  
4 Greenbelt, Maryland 20770  
O: 301 220 2200  
5 F: 301 220 1214  
ewhite@jgllaw.com  
6 bmarkovitz@jgllaw.com  
7 vgrove@jgllaw.com  
8  
9

10 Attorneys for Relator/Plaintiff  
11 JOHN THOMAS STACK

12 **IN THE UNITED STATES DISTRICT COURT FOR THE**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
14 **SAN FRANCISCO DIVISION**

15 UNITED STATES OF AMERICA  
16 and STATE OF CALIFORNIA,  
17 ex rel. JOHN THOMAS STACK,

18  
19 Plaintiffs,

20 v.

21 SUTTER HEALTH, and  
22 SUTTER BAY HOSPITALS d/b/a  
23 CALIFORNIA PACIFIC MEDICAL  
24 CENTER

25 Defendants,  
26  
27  
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Case No.: 3:23-CV-00183-LB

**FILED UNDER SEAL**

**Notice of Voluntary Dismissal of  
Relator's Claims Without Prejudice**

**Action Filed: January 13, 2023**

**Notice of Voluntary Dismissal of Relator's Claims Without Prejudice**

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure and 31 U.S.C. 3730(b)(1), Relator John Thomas Stack, hereby voluntarily dismisses this action without prejudice with respect to Defendants and states as follows:

1. On September 30, 2025, the United States filed a Notice to Decline to Intervene.

2. The next day, on October 1, 2025, the State of California filed a Notice of Declination of Intervention.

3. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Relator hereby notices his dismissal of his claims in this case. The dismissal shall be without prejudice as to the United States' and the Relator's claims against Defendants.

4. Pursuant to 31 U.S.C. § 3730(b)(1), the United States, through Assistant United States Attorney Benjamin Wolinsky, and the state of California, through Supervising Deputy Attorney General Jennifer S. Gregory, hereby consent to this voluntary dismissal.

5. A notice of dismissal pursuant to Rule 41(a)(1)(A)(i) is appropriate because Defendant have not served an answer or a motion for summary judgment in this case.

Respectfully submitted this 22nd day of October 2025.

/s/ Erika Jacobson White

Erika Jacobsen White, (No. 251323)

Brian J. Markovitz (pro hac vice)

Valerie A. Grove (pro hac vice)

Joseph Greenwald & Laake, P.A

6404 Ivy Lane, Suite 400

Greenbelt, Maryland 20770

Telephone: (301)220-2200

Facsimile: (301) 220-1214

Emails: ewhite@jgllaw.com

bmarkovitz@jgllaw.com

vgrove@jgllaw.com

Counsel for Relator/Plaintiff